

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

DEFENDANT'S MOTION FOR FURLough

COMES NOW Defendant Raymond T. Fields, III, by and through counsel, and respectfully requests this Honorable Court grant Defendant a brief furlough and, in support thereof, states as follows:

1. The Defendant has been detained by order of this Court in this matter since the time of his arrest.

2. At the time of his arrest, Defendant was residing at his home at 55 West Penning, Wood River, Illinois. Defendant resided there with his girlfriend, Courtney Womack, a co-defendant in this matter. Courtney Womack is also detained by order of this Court in this matter.

3. Defendant has his own personal property within the Penning residence, as well as the personal property of his young son, Raymond, whose mother is co-defendant Courtney Womack. At the time of his arrest, Defendant was in the process of buying the Penning residence, and was making regular monthly mortgage payments.

4. Defendant has accepted responsibility in this case, and pled guilty to Count 1 of the Indictment on July 21, 2017. Based upon the Plea Agreement, Defendant faces a sentence of approximately 3 years to approximately 6 years, depending upon the Court's findings as to

application of the Sentencing Guidelines. Thus, due to the imminent sentencing, Defendant will be unable to maintain the mortgage on the Penning residence and, if not allowed to pack and remove his and his son's personal belongings, he will lose those personal belongings when the mortgage company takes the home and removes the personal items within. Defendant's parents are deceased, his girlfriend is confined, and Defendant has no other relative who is in a position to assist Defendant in the packing and removal of his and his son's personal belongings from the Penning residence.

5. The Government, by Assistant U.S. Attorney Stephen Clark, objects to the instant Motion.

6. Attached as Exhibit A hereto is the previously filed *pro se* Motion for Furlough, which includes Defendant's personal statement and substantial basis for this instant Motion for Furlough.

WHEREFORE, Defendant respectfully requests this Honorable Court grant his Motion for Furlough, allow him to attend to the packing and storage of his and his son's personal belongings remaining at the residence at 55 West Penning, Wood River, Illinois, and for such other relief as this Court deems appropriate and just under the circumstances.

Dated: August 9, 2017

Respectfully submitted,

BRYAN CAVE LLP

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Attorneys for Defendant Raymond T. Fields

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed electronically this 9th day of August, 2017 and served on all counsel of record via operation of the Court's electronic filing system.

/s/ Hal Goldsmith _____